

No. 24-3422

**In the United States Court of Appeals
for the Ninth Circuit**

IN RE JOHN DOE

JOHN DOE,
Crime Victim-Petitioner

v.

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT
OF CALIFORNIA, SOUTHERN DIVISION,
Respondent.

ANASTASSIA KREZOUNB, UNITED STATES OF AMERICA,
Real Parties in Interest

**Real Party in Interest Anastassia Krezoub's
Motion for Modified Briefing Schedule**

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Motion for Modified Briefing Schedule

Real party in interest Anastassia Krezoub, by and through her attorney of record, Deputy Federal Public Defender Terra D. Castillo Laughton hereby respectfully moves the Court to set following modified briefing schedule:

- Real party in interest United States of America's and Respondent United States District Court for the Central District of California's responses to the petition due on June 21, 2024;
- Real party in interest Anastassia Krezoub's response to the petition due on July 5, 2024;
- Any reply due on July 12, 2024.

This motion is made pursuant to Fed. Rs. App. P. 26(b) and 27 and Cir. R. 31-2.2. Petitioner does not oppose this request. Real party in interest United States of America take no position on this request. This motion is based on the attached declaration, the files and records of this case, and any further information that the Court may request.

June 10, 2024

Respectfully submitted,

CUAUHTEMOC ORTEGA
Federal Public Defender

/s/ Terra D. Castillo Laughton
TERRA D. CASTILLO LAUGHTON
Deputy Federal Public Defender
*Counsel for Real Party in Interest
Anastassia Krezoub*

Declaration of Terra Castillo Laughton

I, Terra Castillo Laughton, hereby declare and state as follows:

1. I am a Deputy Federal Public Defender in the Central District of California.

I represent real party in interest Anastassia Krezoub in this appeal.

2. On May 30, 2024, Petitioner John Doe filed a Petition for Writ of Mandamus (“Writ Petition” or “Petition”) under seal in this Court, along with a stipulation of the parties indicating that the Court need not resolve the petition within 72 hours. On May 31, 2024, this Court set the following initial briefing schedule:

- a. Real parties in interest must file answers to the petition within 21 days. The district court may file an answer simultaneously if it so desires.
- b. The optional reply in support of the petition is due within 7 days after service of the answers.

Dkt. No. 7.

3. Under the Court’s initial briefing schedule, Ms. Krezoub’s opposition to the Petition is due June 21, 2024. This is the same day that the government’s answer to the petition is due.
4. In the district court, Petitioner’s and the government’s positions were closely aligned on the issues presented for this Court’s review in the Writ Petition.

5. Ms. Krezoub therefore requests the following modification to the Court's briefing schedule, to allow her to respond to any arguments made by the government in its answer:

- a. Real party in interest United States of America's and Respondent United States District Court for the Central District of California's responses to the petition due on June 21, 2024;
- b. Real party in interest Anastassia Krezoub's response to the petition due on July 5, 2024;
- c. Any reply due on July 12, 2024.

6. On June 6, 2024, Assistant United States Attorney Andrew Roach, who represents the government in this appeal, informed me via email that the government takes no position on this request.

7. On June 9, 2024, David Carpenter, who represents Petitioner in this appeal, informed me via email that Petitioner does not oppose this request.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 10, 2024, at Santa Ana, California.

/s/ Terra D. Castillo Laughton
TERRA D. CASTILLO LAUGHTON